

93 RF 5495 -

DIST	
BENEDETTI, R.L.	
BENJAMIN, A.	
BERMAN, H.S.	
BRANCH, D.B.	
CARNIVAL, G.J.	
COPP, R.D.	
DAVIS, J.G.	
FERRERA, D.W.	
HANNI, E.J.	
HARMAN, L.K.	
HEALY, T.J.	
HEDAH, T.	
HILBIG, J.G.	
KIRBY, W.A.	
KUESTER, A.W.	
LEE, E.M.	
MANN, H.P.	
MARX, G.E.	
MCDONALD, M.M.	
McKENNA, F.G.	
MONROSE, J.K.	
MORGAN, R.V.	
POTTER, G.L.	
PIZZUTO, V.M.	
RILEY, J.H.	
SANDLIN, N.B.	
GUUDE, P.S.	
Chestnut, V.A.	
SWANSON, E.H.	
WILKINSON, R.B.	
WILLIAMS, S. (ORC)	
WILSON, J.M.	
ZANE, J.O.	

Aguero, G.	
Broussard, M.	
Busby, W.S.	
Cable, J.R.	
Clausen, B.M.	
Duke, S.D.	
Edrich, P.W.	
Glover, W.S.	
Hedahl, T.G.	
Jackson, D.R.	
McKenna, F.G.	
Ross, J.F.	
Schubert, A.J.	
Thompson, J.D.	
CORRES CONTROL	
ADMIN RECORD	
TRAFFIC	
White, B.L.	
Tallman, D.S.	

CLASSIFICATION:

UCN	
UNCLASSIFIED	
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER

DATE

IN REPLY TO RFP CC NO:
None

ACTION ITEM STATUS

☐ OPEN ☐ CLOSED☐ PARTIAL

LTR APPROVALS:

ORIG & TYPIST INITIALS

JFR/DHC

FF-46465 (Rev. 3-93)

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303)

May 7, 1993

A. H. Pauole
Acting Manager
DOE, RFOAttn: J. K. Hartman, Environmental and Waste Management
M. S. Karol, Operations
T. E. Lukow, Waste Management and Environmental Division

COLORADO DEPARTMENT OF HEALTH (CDH) INSPECTION OF PROPERTY UTILIZATION AND DISPOSAL (PU&D), 964 LAY DOWN YARD, AND BUILDING 371 MIXED RESIDUE AREAS - APRIL 29, 1993 - JGD-0764-93

On April 29, 1993, enforcement inspectors and permit writers from the CDH inspected the PU&D North Yard, the 964 Lay Down Yard, and Building 371 Mixed Residue areas.

Personnel Present (for parts or all of the inspection):

C. Alstatt, CDH, Enforcement Inspector	M. J. Landrus, EG&G Rocky Flats, Inc.
A. J. Asti Jr., EG&G Rocky Flats, Inc.	L. A. Langlois, EG&G Rocky Flats, Inc.
J. R. Barnett, EG&G Rocky Flats, Inc.	C. L. Lucero, EG&G Rocky Flats, Inc.
M. C. Broussard, EG&G Rocky Flats, Inc.	M. A. Martinez, EG&G Rocky Flats, Inc.
W. S. Busby, EG&G Rocky Flats, Inc.	D. R. McNulty, EG&G Rocky Flats, Inc.
J. R. Cable, EG&G Rocky Flats, Inc.	J. M. Mynard, EG&G Rocky Flats, Inc.
V. L. Church, EG&G Rocky Flats, Inc.	M. Neimeyer, CDH, Enforcement Inspector
P. W. Edrich, EG&G Rocky Flats, Inc.	D. J. Nickless, DOE, RFO, NMMB
G. A. Elvey, EG&G Rocky Flats, Inc.	D. Norbury, CDH, Permitting
R. L. Erfurdt, EG&G Rocky Flats, Inc.	J. F. Ross, EG&G Rocky Flats, Inc.
M. R. Ferrari, EG&G Rocky Flats, Inc.	J. P. Schneider, DOE, RFO, WOB
K. A. Holstein, EG&G Rocky Flats, Inc.	J. R. Swanson, CDH, IAG
D. R. Jackson, EG&G Rocky Flats, Inc.	J. I. Webber, EG&G Rocky Flats, Inc.
R. G. Johnson, EG&G Rocky Flats, Inc.	K. M. Wiebe, EG&G Rocky Flats, Inc.
D. A. Koch, EG&G Rocky Flats, Inc.	J. Williams, CDH, Enforcement Inspector
S. W. Kranker, EG&G Rocky Flats, Inc.	L. Woodward-Weers, CDH, Permitting

PU&D North Yard:

The CDH enforcement inspectors observed several of the cargo containers and the Resource Conservation and Recovery Act (RCRA) 90-day accumulation area in the PU&D North Yard. Area management explained the progress in obtaining full characterization of the liquids and sludge in drums at the yard. The CDH inspectors were told that several of the

GROUP	ACT	INFO
11000		
ERM		
964 LAY DOWN		
PIR		
11100		
RPM		
11200		
ES&E		
11300		
SPP		
11400		
FOM		
11500		
RLD		
11600		
SM		
11700		
EQS		

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REVIEWED FOR CLASSIFICATION/UCN
BY G. T. Gaudick 520
DATE 8-11-93

A-DU10-000082

analytical results had been invalidated due to improper laboratory procedures. These materials are being resampled and sent to a different laboratory.

One of the CDH inspectors expressed a concern about characterizing soil contaminated with diesel fuel and hydraulic oil as hazardous. Area management explained that the soil had been labeled as hazardous waste, placed in the 90-day area pending analysis, and would be managed in accordance with verified analytical results.

The CDH inspectors discussed and reviewed previously requested action plans for decontamination and management of three water tanker trucks in the yard with PU&D management personnel.

The CDH inspectors stated that the soil being managed as hazardous waste was the only issue identified at the PU&D North Yard and PU&D Management did not need to attend the exit briefing. Statements by the inspectors indicated that they were pleased with the progress towards characterization and management of the materials stored in the yard.

964 Lay Down Area:

Paperwork for two "uncleared" CDH inspectors had not been approved by Wackenhut, Justification. The name of the individual that DOE personnel provided as the visitor sponsor on the justification form could not be verified by Wackenhut. Waste Surveillance representatives made the necessary arrangements to have the justifications approved by noon.

The CDH Interagency Agreement (IAG) and CDH Permitting personnel asked if the scrap materials stored in the Operable Unit (OU) 10 and associated Individual Hazardous Substance Sites (IHSS) will be removed to allow sampling for the remedial investigation to start. Facility Operations personnel stated that the materials are being removed. Facility Operations personnel also explained which Rocky Flats Plant (RFP) organizations are responsible for the different areas within the 964 Lay Down Yard.

The CDH inspectors observed drums stored near Building 965 and in the adjacent cargo container. A hissing sound was heard from one of the drums in the cargo container. The inspector was asked to exit the cargo container until Facility Operations management could ensure that there were no health and safety risks.

The CDH inspectors commented that of approximately 40 drums in the area none were labeled, and several of the drums in the cargo container which were covered with plastic did not have lids. The inspectors also asked questions about the characterization of the drums in the area. Facility Operations explained that the drums have been fingerprinted and still require full analytical characterization, which has been scheduled. The drums

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will be labeled when the results are verified. Facility Operations personnel also stated that the drums in the cargo container were believed to be empty. However, when the lids were cut off to dispose of the drums, liquid and sludge were discovered. The plastic was placed on the drums to avoid collection of rainwater prior to placing the drums into the cargo container.

The CDH inspectors indicated that a problem exists regarding lack of characterization for materials in the 964 Lay Down Yard. The CDH inspectors stated that they will request a copy of the 964 Lay Down Yard waste characterization action plan if it has not been previously requested.

While in the area, the inspectors observed the Protected Area Remedial Action Decontamination Pad. The CDH inspectors expressed a concern over the regulatory status of the decontamination pad. They stated that they were not aware that the pad was operable.

Management representation by Environmental Management had not been contacted for this tour. The inspectors noted that there was liquid in the secondary containment and asked the individual working in the area several questions. Waste Surveillance representatives asked that the CDH inspectors wait until Environmental Management personnel could be contacted to answer the questions.

Waste Surveillance personnel contacted RCRA Regulatory Programs personnel to determine the regulatory status of the decontamination pad. RCRA Regulatory Programs personnel explained that the pad and its operating requirements are identified in the Interagency Agreement OU 4 Work Plan. The inspectors were informed of this after the lunch break.

Building 371 Mixed Residue Areas:

Building 371 Radiation Protection personnel, following applicable plant procedures and rules, had to deny entry into the Radiation Control Area (RCA) to three of the inspectors. These individuals use North respirators which have been banned from use at RFP. This information had not been provided to the CDH inspectors. The inspectors have been allowed into RCAs in other buildings on four inspections since the ban on North respirators was enacted. This was the first time the CDH inspectors were challenged by building personnel.

A second issue was identified regarding the qualitative respirator fit test and training for the CDH personnel. The CDH inspectors have not been challenged on past inspections for their respirator fit test cards. All CDH personnel receive fit tests at National Jewish Hospital. The program at National Jewish has not been reviewed by the RFP Industrial Hygiene department to assure that it meets the necessary Occupational Safety and Health Administration requirements, which must be used to allow personnel at RFP to enter the RCA.

Industrial Hygiene representatives stated that if the CDH personnel had their fit test cards from National Jewish, they could go to Building 452G for smoke tests and be allowed into the RCA, providing they had the correct respirators. In accordance with Radiological Operating Instructions 9.01, smoke tests are no longer administered by building Radiation Safety personnel. Five of the six inspectors did not have their cards with them at the time. Additionally, there was inadequate time to get the smoke tests and return to the building for the tour.

The CDH inspectors notified their director at CDH of the access denial. Following several telephone conversations, the CDH inspectors stated that CDH is responsible for the health, safety, and training of its personnel. They further stated that they could not be denied access due to site specific training requirements, especially if they had equivalent qualifications.

Waste Surveillance representatives immediately notified Waste Programs and Industrial Hygiene management personnel of the problems.

The CDH inspectors inspected RCRA Units 90.1 and 90.11, which are located outside of the RCA. Unit 90.1 is contained in both the State RCRA Permit and in the Permit Modification for Mixed Residues. The CDH Permitting individual stated that the waste and mixed residues appeared to be stored in excess of the permitted capacity for the unit. There is a contradiction over capacity between the two permit documents. Area personnel were not able to respond to questions about capacity. The CDH permitting individual stated that he would have to review the permit and modification, and discuss the requirements with his management prior to further comment.

The DOE and CDH representatives asked several questions about the remaining work to be done to prepare these rooms for compliance with the permit modification. Waste Assay & Shipping (WA&S) personnel explained the work orders in place. The WA&S representative also explained the operation of the Segmented Gamma Scan drum counter in Unit 90.11 and the staging operations in Unit 90.1.

The CDH inspectors and permitting representatives reviewed the inspection logs, building floor plans, and the Waste & Environmental Management System (WEMS) inventory for the four units in Building 371 that are included in both the State RCRA Permit and in the Permit Modification for Mixed Residues.

Exit Briefing:

The CDH inspectors reiterated their position on access to all areas of the facility. DOE representatives held several conversations with the CDH inspectors and assured them the problems would be resolved.

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There were no comments for the PU&D North Yard. The CDH inspectors stated that there are problems with characterization and labeling of the drums at the 964 Lay Down Yard. The inspectors stated that if the analytical results indicate that the waste is regulated, storage and management of the waste has been in violation of RCRA since the waste was generated or discovered.

The CDH Inspectors received the documents listed on the attached Document Transmittal forms. Please note that part of the documents transmitted are Unclassified Controlled Nuclear Information (UCNI) and the WEMS inventory is very lengthy. Therefore, these documents are not attached but are on file with Waste Surveillance.

Two Notices of Inspection requesting the following documents were issued:

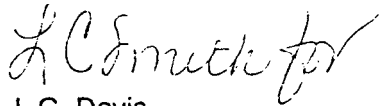
- Inspection records for the decontamination pad since operations began up to and including April 29, 1993 (Environmental Management)
- Training documentation for Frank Lopez and all inspectors assigned to the pad (Environmental Management)
- Analytical results for sludge and liquids generated at the decontamination pad (Environmental Management)
- A copy of the 964/965 Lay Down Yard Flow Sheet for management of the 964 drums (Facility Operations)
- Written bi-weekly status of the sampling and characterization of the forty remaining drums at the 964 Lay Down Yard (Facility Operations)
- Written notification of disposition of all containers in the 964 Lay Down Yard within 5 days of final disposition (Facility Operations)
- WEMS Inventory for RCRA Units 90.10, 90.11, and 90.16 in Building 371 for April 29, 1993 (Waste Assay & Shipping)

Follow-Up Actions:

- Waste Surveillance has brought the issues regarding the North Respirators and the fit test cards to the attention of Industrial Hygiene.
- The CDH inspectors have agreed to get concurrent respirator fit test approval with RFP Industrial Hygiene. Waste Surveillance is scheduling the necessary fit tests for the CDH personnel.
- Waste Surveillance is making arrangements for CDH uncleared inspectors and permitting personnel to obtain Access Control justifications for one month time periods.
- Waste Surveillance personnel have reviewed protocols for CDH inspections and tours and will verify all arrangements in future.

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If you have any questions or require additional information, please contact Dan Tallman, Waste Surveillance, at extension 8889 or John Ross, Waste Surveillance, at extension 8885.



J. G. Davis
Associate General Manager
Standards, Audits, and Assurance
EG&G Rocky Flats, Inc.

JFR:dhc

Orig. and 3 cc - A. H. Pauole

Enclosures:

1. Notice of Inspection, April 29, 1993
2. Document Transmittal Form, April 29, 1993
3. Inspection Log Sheet, November 19, 1992
4. Roster, April 29, 1993
5. Material Storage Areas
6. Equipment Decontamination Pad Daily Inspection Checklist
7. Certification of Task Completion, June 3, 1992
8. D. R. Jackson ltr to D. S. Tallman, DRJ-102-93, CDH Tour April 29, 1993, May 3, 1993
9. K. A. Holstein ltr to D. S. Tallman, KAH-0504-93, Colorado Department of Health Inspection 964 & 965 Laydown Yard, April 29, 1993, May 5, 1993